

ATTACHMENT A
EXCERPT OF SUBPOENAS

RELEVANT TIME PERIODS SPECIFIED IN META'S NON-PARTY SUBPOENAS

Specified Relevant Time Period	Citation to Relevant Subpoena(s)
January 1, 2004 to end of discovery	LinkedIn ¶¶ 14, 61.
January 1, 2006 to end of discovery	Netflix ¶¶ 14, 54; SmugMug ¶¶ 14, 59; Yelp ¶¶ 14, 53.
January 1, 2007 to end of discovery	PageBites ¶¶ 14, 60; Twitter ¶¶ 14, 59.
January 1, 2009 to end of discovery	Quora ¶¶ 14, 60.
January 1, 2010 to end of discovery	Pinterest ¶¶ 14, 60; Tencent ¶¶ 14, 59; Nextdoor ¶¶ 14, 60; Discord ¹ ¶¶ 14, 53.
January 1, 2011 to end of discovery	Zoom ¶¶ 14, 53.
January 1, 2014 to end of discovery	Signal ¶¶ 14, 53.
January 1, 2020 to end of discovery	Alpha Exploration ¶¶ 14, 53.

¹ Meta's non-party subpoena to Discord specifies conflicting relevant time periods: ¶ 14 defines the relevant time period as "January 1, 2010 up culmination of discovery in this Action," while ¶ 53 defines the relevant time period as "January 1, 2015 up to the conclusion of fact discovery in this Action."

REQUESTS FOR PRODUCTION

Request for Production No. 8 (LinkedIn, Smugmug); No. 9 (Alpha Exploration, Pagebites, Pinterest, Zoom); No. 10 (Signal); No. 11 (Quora, Yelp); No. 12 (Discord, Netflix, Tencent); No. 17 (Nextdoor); No. 18 (Twitter):

“All Documents and data relating to each and every Named Plaintiff.”

Request for Production No. 10 (LinkedIn, Smugmug); No. 11 (Alpha Exploration, Pagebites, Zoom); No. 13 (Pinterest, Signal, Quora, Yelp); No. 14 (Discord, Netflix, Tencent); No. 19 (Nextdoor); No. 20 (Twitter)

“Documents sufficient to identify the Privacy Policies, and where applicable the Privacy Settings, associated with each and every account associated with each and every Named Plaintiff for use of Your Products, including deprecated versions of the Privacy Policies and Privacy Settings that no longer apply.”

EXHIBIT B
NOTICES OF SUBPOENAS

WILMER CUTLER PICKERING
HALE AND DORR LLP

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Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of themselves and all others similarly situated,

Plaintiffs.

V.

META PLATFORMS, INC., a Delaware Corporation headquartered in California.

Defendant

Case No. 3:20-cv-08570-JD

DEFENDANT META PLATFORMS, INC.’S NOTICE OF SUBPOENAS FOR PRODUCTION TO NON-PARTIES

Judge: Hon. James Donato

1 **NOTICE OF SUBPOENA FOR PRODUCTION TO NON-PARTY**

2 PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 34(c) and 45,
 3 Defendant Meta Platforms, Inc. intends on February 24, 2022 or as soon as possible thereafter to
 4 serve a Subpoena to the non-parties listed below commanding the production of documents set
 5 forth in the attached hereto:

NON-PARTY	DATE AND TIME
Alpha Exploration Co. 548 Market Street, PMB 72878 San Francisco, CA 94104	March 28, 2022, 9:00 AM
Chris DeWolfe 9512 Heather Road Beverly Hills, CA 90210	March 28, 2022, 9:00 AM
Epsilon Data Management LLC 6021 Connection Drive Irving, TX 75039	March 28, 2022, 9:00 AM
Iannis Hanen 1928 Woodland Ave. Santa Clara, CA 95050-6510	March 28, 2022, 9:00 AM
Jonathan Abrams 8-Bit Capital LLC 665 Third St., Suite 150 San Francisco, CA 94107	March 28, 2022, 9:00 AM
Microsoft Corporation One Microsoft Way Redmond, WA 98052	March 28, 2022, 9:00 AM
Nextdoor Holdings, Inc. 420 Taylor Street San Francisco, CA 94102	March 28, 2022, 9:00 AM
Quora Inc. 605 Castro Street #450 Mountain View, CA 94041	March 28, 2022, 9:00 AM
Razer USA Ltd. 9 Pasteur, Suite 100 Irvine, CA 92618	March 28, 2022, 9:00 AM

	NON-PARTY	DATE AND TIME
2	Samsung Electronics America, Inc. 85 Challenger Road Ridgefield Park, NJ 07660	March 28, 2022, 9:00 AM
4	Shopify Inc. c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	March 28, 2022, 9:00 AM
7	Tom Anderson 1108 Auahi St., Apt. 2800 Honolulu, HI 96814-4917	March 28, 2022, 9:00 AM
9	Viant Technology, Inc. 2722 Michelson Drive #100 Irvine, CA 92612	March 28, 2022, 9:00 AM
12	Yelp, Inc. 140 New Montgomery St., 14th Floor San Francisco, CA 94105	March 28, 2022, 9:00 AM

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17 Dated: February 23, 2022

Respectfully submitted,

18 By: /s/ David Z. Gringer19 DAVID Z. GRINGER (*pro hac vice*)
20 David.Gringer@wilmerhale.com
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11 *Attorneys for Defendant Meta Platforms, Inc.*
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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2022, I caused the foregoing document to be served on all counsel of record by email.

By: /s/ David Z. Gringer
DAVID Z. GRINGER

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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation headquartered in California,
Defendant.

Case No. 3:20-cv-08570-JD

**DEFENDANT META PLATFORMS,
INC.'S NOTICE OF SUBPOENAS FOR
PRODUCTION OF DOCUMENTS TO
NON-PARTIES**

Judge: Hon. James Donato

1 **NOTICE OF SUBPOENA FOR PRODUCTION OF DOCUMENTS TO NON-PARTIES**

2 PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 34(c) and 45,
 3 Defendant Meta Platforms, Inc. intends on February 24, 2022 or as soon as possible thereafter to
 4 serve Subpoenas to the non-parties listed below commanding the production of documents set
 5 forth in the attached hereto:

NON-PARTY	DATE AND TIME
Discord, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange St. Wilmington, DE 19801	March 28, 2022, 5:00 PM
Epic Games, Inc. c/o CT Corporation System 160 Mine Lake Ct., Suite #200 Raleigh, NC 27615	March 28, 2022, 5:00 PM
Foursquare Labs, Inc. c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	March 28, 2022, 5:00 PM
Kakao Games USA Inc. 3 Park Plaza, Ste. 1150 Irvine, CA 92614	March 28, 2022, 5:00 PM
NAVER BAND Inc. c/o Yeong-Sae Kim, Esq. 1700 Wyatt Dr., Suite 9 Santa Clara, CA 95054	March 28, 2022, 5:00 PM
Netflix, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange St. Wilmington, DE 19801	March 28, 2022, 5:00 PM
PageBites, Inc. c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	March 28, 2022, 5:00 PM

	NON-PARTY	DATE AND TIME
1	Pinterest, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange St. Wilmington, DE 19801	March 28, 2022, 5:00 PM
2	Sgrouples, Inc. c/o Cogency Global, Inc. 850 New Burton Rd., Suite #201 Dover, DE 19904	March 28, 2022, 5:00 PM
3	Signal Messenger, LLC c/o Cogency Global, Inc. 850 New Burton Rd., Suite #201 Dover, DE 19904	March 28, 2022, 5:00 PM
4	SmugMug, Inc. c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	March 28, 2022, 5:00 PM
5	Snap Inc. c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	March 28, 2022, 5:00 PM
6	Spotify USA Inc. c/o CT Corporation System 28 Liberty St. New York, NY 10005	March 28, 2022, 5:00 PM
7	Tencent America LLC c/o Paracorp Incorporated 2140 S. Dupont Hwy. Camden, DE 19934	March 28, 2022, 5:00 PM
8	TikTok, Inc. c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	March 28, 2022, 5:00 PM
9	Twitter, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange St. Wilmington, DE 19801	March 28, 2022, 5:00 PM

NON-PARTY	DATE AND TIME
Zoom Video Communications, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange St. Wilmington, DE 19801	March 28, 2022, 5:00 PM

6
7 Dated: February 23, 2022

Respectfully submitted,

8 By: /s/ Mark C. Hansen

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10 Mark C. Hansen (*pro hac vice*)
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15 Attorneys for Defendant Meta Platforms, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2022, I caused the foregoing document to be served on all counsel of record by email.

By: /s/ Mark C. Hansen
MARK C. HANSEN

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Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Case No. 3:20-cv-08570-JD

Plaintiffs,

**DEFENDANT META PLATFORMS,
INC.'S NOTICE OF SUBPOENA FOR
PRODUCTION TO NON-PARTY**

META PLATFORMS, INC., a Delaware Corporation headquartered in California,

Judge: Hon. James Donato

Defendant

1 **NOTICE OF SUBPOENA FOR PRODUCTION TO NON-PARTY**

2 PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 34(c) and 45,
 3 Defendant Meta Platforms, Inc. intends on March 4, 2022 or as soon as possible thereafter to serve
 4 a Subpoena to the non-party listed below commanding the production of documents set forth in
 5 the attached hereto:

NON-PARTY	DATE AND TIME
LinkedIn Corporation 1000 West Maude Avenue Sunnyvale, CA 94085	April 11, 2022, 9:00 AM

10 Dated: March 3, 2022

Respectfully submitted,

11 By: /s/ David Z. Gringer

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28 *Attorneys for Defendant Meta Platforms, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March, 2022, I caused the foregoing document to be served on all counsel of record by email.

By: /s/ David Z. Gringer
DAVID Z. GRINGER